

## EXHIBIT C

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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIEANNA  
 MUNIZ, ELIZA CAMBAY, SAL  
 CATALDO, EMIR GOENAGA, JULIAN  
 SANTIAGO, HAROLD NYANJOM,  
 KELLIE NYANJOM, and SUSAN LYNN  
 HARVEY, individually and on behalf of all  
 others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688

**DECLARATION OF SACHIN KUMAR  
 SINHA**

Magistrate Judge Alex G. Tse  
 Courtroom A – 15th Floor

**DECLARATION OF SACHIN KUMAR SINHA**

I, Sachin Kumar Sinha, declare as follows.

1. I am a Director at Concur IP Consulting, an IP consulting firm that I co-founded in October 2015. Before forming Concur IP, I was a Senior Manager of IP Advisory Services at Ernst & Young LLP in India for three months, and before that, I was an Associate Director of Global IP Services at Thomson Reuters. I have a B.Tech. in Electronics and Communication Engineering from the Indian Institute of Technology Guwahati ("IIT Guwahati"). After graduating from IIT Guwahati in May 2005, I worked as an engineer for a year at Reliance Communications, one of the largest telecom companies in India at that time.

2. Concur IP has over 60 full-time employees in India. We provide a number of services to our clients, including patent searches, patent drafting, patent licensing support, litigation support, document review services, patent docketing and paralegal support services.

3. Concur IP became part of Questel group in 2019. Questel has over 1,500 employees in 30 countries (including over 300 employees in the United States) and has served over 20,000 clients since its inception in 1978.

4. Concur IP has served more than 50 clients in the past 5 years. Our clients include several United States Fortune 500 companies, who trust us with their confidential information. We also draft patents for many of these companies, and they disclose highly sensitive, confidential invention information to us under non-disclosure agreements. Due to the sensitive nature of our engagements, most of our clients prohibit us from disclosing their names. However, we have permission from a few select clients including 3M and Tenneco to disclose their names. We have also worked with several reputed law firms, including Sidley Austin LLP; Fish & Richardson, Sheppard, Mullin, Richter & Hampton LLP; Perkins Coie; Kirkland & Ellis LLP; Covington & Burling LLP; Wilmer Cutler Pickering Hale and Dorr LLP; Goodwin Procter LLP; Hogan Lovells International LLP; and Susman Godfrey LLP.

5. We implement strict IT practices and policies to ensure data security. Among other things, we use Fortigate Firewall; allow remote access only through a Forti Secure Sockets Layer Virtual Private Network; ensure device-level security by using Trusted Platform Module

1 encryption with antivirus; disable USB ports on all devices; block data transfer websites, personal  
2 emails, social networking websites, and potentially harmful websites; use an on-premises  
3 Application Delivery Controller server; use Amazon Web Services for secure data storage; use an  
4 Active Directory domain, to which all devices are joined; and regularly push security updates to  
5 devices and networks. Detailed documentation on IT policies of Concur IP can be made available  
6 upon request.

7           6.       We have supported our clients in several court cases in the United States, Europe  
8 and China. In some of these cases, we had access to confidential materials governed by protective  
9 orders. These cases include *Brown v. Google*, No. 5:20-cv-3664-LHK-SVK (N.D. Cal.); *In re*  
10 *Qualcomm Antitrust Litigation*, No. 5:17-cv-0773-LHK (N.D. Cal.), *TCL Communication*  
11 *Technology Holdings, Ltd. v. Telefonaktiebolaget LM Ericsson*, No. 8:14-cv-341 (C.D. Cal.), *TQ*  
12 *Delta, LLC v. 2Wire, Inc.*, No. 1:13-cv-1835 (D. Del.), and *HTC Corporation v.*  
13 *Telefonaktiebolaget LM Ericsson*, No. 6:18-cv-243-JRG (E.D. Tex.).

14           7.       Concur IP and its employees have never breached, nor been accused of breaching,  
15 any protective order or other confidentiality agreement.

16           8.       I have been called for depositions in the United States on multiple occasions in  
17 connection with court cases and arbitrations including *TCL Communication Technology Holdings,*  
18 *Ltd. v. Telefonaktiebolaget LM Ericsson*, No. 8:14-cv-341 (C.D. Cal.), *Huawei Technologies Co.*  
19 *v. T-Mobile US, Inc.*, No. 2:16-cv-52 (E.D. Tex.), and *ASUS v. InterDigital*, No. 5:15-cv-1716  
20 (N.D. Cal.). I have always complied with the deposition requests, some of which were made on  
21 short notice.

22           9.       I declare under penalty of perjury under the laws of the United States of America that  
23 the foregoing is true and correct. Executed this 20<sup>th</sup> day of December, 2021, at Mumbai, India.

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